

MAR 27 2020

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

UNITED STATES OF AMERICA,

Plaintiff,

V.

EMMA ZANDER,

Defendant.

INFORMATION

1:20 CR 234
CASE NO.

Title 18, United States Code,
Section 1344(2)

JUDGE GAUGHAN

GENERAL ALLEGATIONS

At all times relevant to this Information:

1. KeyBank, was a financial institution as defined in Title 18, United States Code, Section 20, the deposits of which were insured by the Federal Deposit Insurance Corporation.
2. Huntington National Bank, was a financial institution as defined in Title 18, United States Code, Section 20, the deposits of which were insured by the Federal Deposit Insurance Corporation.

SCHEME TO DEFRAUD

It was part of the scheme to defraud the victim banks that at various times:

3. Defendant EMMA ZANDER ("ZANDER") would enter various branches of the Banks where she would present fake identification bearing her face, but in the name of account holders K.G., J.K., N.T., K.S., P.N., B.C., and J.P.

4. ZANDER would use these fake identification to trick a bank teller into giving her access to the account holders' bank accounts.

5. Once the bank tellers were tricked into granting access, ZANDER would make cash withdrawals and initiate wire transfers out of the account holders' bank accounts.

6. ZANDER did not have authorization from any account holder to conduct these financial transactions.

7. This chart summarizes the dates, institutions, locations, account holders, and transaction types that were part of ZANDER's scheme:

Date	Financial Institution	Bank Branch Location	Account Holder	Fraudulent Activity
6/20/2019	KeyBank	8550 Transit Rd. East Amherst, NY 14051	K.G.	Attempted to withdraw \$15,000
6/20/2019	KeyBank	9640 Transit Rd. East Amherst, NY 14051	K.G.	Attempted to withdraw \$15,000
7/1/2019	KeyBank	55 Douglas Ln. East Aurora, NY 14052	J.K.	Attempted to gain access to \$265,000, and successfully withdrew \$15,000
7/2/2019	KeyBank	8899 Main St. Williamsville, NY 14221	N.T.	Attempted to withdraw \$15,000
7/17/2019	KeyBank	1485 Lexington Ave. Mansfield, OH 44907	K.S.	Withdrew \$4,500
7/17/2019	KeyBank	688 North Lexington Ave. Mansfield, OH 44906	K.S.	Withdrew \$2,000
7/17/2019	Huntington Bank	209 Wooster St. Lodi, OH 44254	N.F.	Withdrew \$5,000

7/17/2019	Huntington Bank	5321 Warrensville Center Rd. Maple Heights, OH 44137	N.F.	Withdrew \$6,500
7/26/2019	KeyBank	8 N. State St. Painesville, OH 44077	B.C.	Attempted to gain access to \$70,000
8/2/2019	Huntington Bank	5805 Peach St. Erie, PA 16509	J.P.	Attempted to withdraw \$8,000
8/2/2019	Huntington Bank	2185 W. 12th St. Erie, PA 16505	J.P.	Attempted to withdraw \$7,000

COUNT 1

(Bank Fraud, 18 U.S.C. § 1344(2))

The United States Attorney charges:

8. The United States Attorney alleges and incorporates by reference the factual allegations set forth in paragraphs 1 through 7 of the Indictment as if fully set forth herein.

9. From on or about June 20, 2019, to on or about July 26, 2019, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant EMMA ZANDER knowingly executed and attempted to execute a scheme and artifice to obtain money under the custody and control of KeyBank, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344(2).

COUNT 2

(Bank Fraud, 18 U.S.C. § 1344(2))

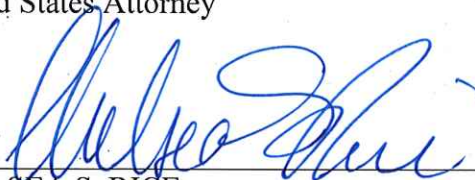
The United States Attorney further charges:

10. The United States Attorney alleges and incorporates by reference the factual allegations set forth in paragraphs 1 through 7 of the Indictment as if fully set forth herein. From on or about July 17, 2019, to on or about August 2, 2019, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant EMMA ZANDER knowingly executed and attempted to execute a scheme and artifice to obtain money under the custody and control of

Huntington National Bank, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344(2).

JUSTIN E. HERDMAN
United States Attorney

By:



CHELSEA S. RICE
Chief, White Collar Crimes Unit